

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHENIECE CLARK,	:	12 Civ. 9372 (KMK) (LMS)
	:	
Plaintiff,	:	
	:	<b>DEFENDANT'S NOTICE OF</b>
v.	:	<b>MOTION FOR SUMMARY</b>
	:	<b>JUDGMENT</b>
JEWISH CHILD CARE ASSOCIATION, INC.,	:	<b><u>ORAL ARGUMENT REQUESTED</u></b>
	:	
Defendant.	:	
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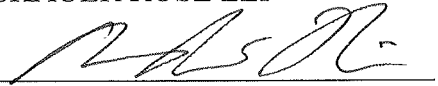
PLEASE TAKE NOTICE that upon the pleadings and prior proceedings had herein, the annexed Declaration of Andrew E. Rice, Esq. in Support of Defendant's Motion for Summary Judgment and exhibits attached thereto, the annexed Declaration of Steven Mayo in Support of Defendant's Motion for Summary Judgment, the annexed Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1 and the accompanying Memorandum of Law in Support of Defendant's Motion for Summary Judgment, Defendant Jewish Child Care Association, Inc. shall move this Court, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, at such time as the Court may direct, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment to Defendant and dismissing Plaintiff's Complaint in its entirety with prejudice, together with such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Scheduling Order dated July 2, 2014, answering papers, if any, must be served upon the undersigned on or before September 12, 2014 and reply papers, if any, shall be served on Plaintiff on or before October 3, 2014.

Dated: New York, New York  
August 8, 2014

Respectfully submitted,

PROSKAUER ROSE LLP

By: 

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Andrew E. Rice

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